

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
May 3 10 02 AM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**PITNEY BOWES, INC. MOTION
FOR ACCEPTANCE OF LATE DESIGNATED
WRITTEN CROSS EXAMINATION**

Pitney Bowes Inc. ("Pitney Bowes") propounded PB/USPS-T-33-4 to witness Fronk. Witness Fronk redirected the question to witness Mayo. Counsel for Pitney Bowes neglected to designate witness Mayo's answer to the question as its written cross examination of her. We ask permission to designate that interrogatory and its answer out of time. The Postal Service has indicated that it has no objection to this request. We apologize for any added burden on the Commission's staff occasioned by our mistake and, though we are tendering two copies of PB/USPS-T-33-4 for inclusion in the transcription of proceedings, we would be happy to re-submit those documents at some later time if to do so would be more convenient for the Commission staff.

Respectfully submitted,




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Counsel for Pitney Bowes Inc.

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.


Ian D. Volner